IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

: Case No.: 18-12390

Harry Rivera : Chapter 13

Iris R. Rivera : Judge Eric L. Frank

Debtor(s)

:

MidFirst Bank : Date and Time of Hearing

Movant, : Place of Hearing

: November 21, 2019 at 11:00 a.m.

:

Harry Rivera : 400 Washington Street

Iris Rivera : Courtroom #1

: Reading, PA, 19601

Scott F. Waterman

Respondents.

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

MidFirst Bank has filed a Motion for Relief from the Automatic Stay to permit MidFirst Bank to foreclose on 223 W 38th Street, Reading, PA 19606.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before November 13, 2019, you or your attorney must do **ALL** of the following:
 - A. File an answer explaining your position at:

Clerk, U.S. Bankruptcy Court

400 Washington Street Reading, PA, 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above, and

B. Mail a copy to the Creditor's attorney and the below listed:

United States Trustee Office of the U.S. Trustee 200 Chestnut Street, Suite 502 Philadelphia, PA 19106

Scott F. Waterman (Chapter 13) Chapter 13 Trustee 2901 St. Lawrence Ave. Reading, PA 19606 scottfwaterman@gmail.com

Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above, and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
- 3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank on November 21, 2019 at 11:00 a.m. in 400 Washington Street, Courtroom #1, Reading, PA, 19601.
- 4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been canceled because no one filed an answer.

DATE: October 29, 2019

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Scott F. Waterman

Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Notice of Motion, Response Deadline, and Hearing Date regarding Motion for Relief from the Automatic Stay to permit MidFirst Bank to foreclose on 223 W 38th Street, Reading, PA 19606 was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 200 Chestnut Street, Suite 502, Philadelphia, PA 19106

Scott F. Waterman (Chapter 13), Chapter 13 Trustee, 2901 St. Lawrence Ave., Suite 100, Reading, PA 19606

David S. Gellert, Attorney for Harry Rivera and Iris R. Rivera, David S. Gellert PC, 3506 Perkiomen Avenue, Reading, PA 19606, dsgrdg@ptdprolog.net

The below listed parties were served via regular U.S. Mail, postage prepaid, on October <u>29</u>, 2019:

Harry Rivera and Iris R. Rivera, 223 West 38th Street, Reading, PA 19606

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Harry Rivera and Iris Rivera, 223 W 38th Street, Reading, PA 19606

DATE: October 29, 2019

/s/ Karina Velter

Karina Velter, Esquire (94781) Adam B. Hall (323867) Sarah E. Barngrover (323972) Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028 Telephone: 614-220-5611

Fax: 614-627-8181 Attorneys for Creditor

The case attorney for this file is Karina

Velter.

Contact email is kvelter@manleydeas.com